

1 Vanessa R. Waldref
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3 Eastern District of Washington
4 Todd M. Swensen
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9
10 IN THE UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON
12

13 UNITED STATES OF AMERICA,

1:21-CR-02055-SMJ-1

14 Plaintiff,

UNITED STATES' SENTENCING
MEMORANDUM

15 v.

16 BEVERLEIGH QUENAN
17 PETERSON,

18 Defendant.
19

20 The United States of America, by and through Vanessa R. Waldref,
21 United States Attorney for the Eastern District of Washington, and Todd M.
22 Swensen, Assistant United States Attorney, submits the following United States'
23 Sentencing Memorandum.

24 **I. Base Offense Level & Enhancements:**

25 The Defendant pled guilty to Theft of Government Funds, in violation of
26 18 U.S.C. §641. The United States has no objections to the Presentence
27
28

1 Investigation Report (PSIR) (ECF 26), which provides for a base offense level of
2 6, with a total offense level of 10. The United States concurs with the PSIR's
3 Total Offense Level calculation. The statutory maximum term of imprisonment
4 is not more than 10 years and/or a \$250,000.00 fine. 18 U.S.C. § 641. The
5 Guideline rang is 6-12 months, with a criminal history category of I. The United
6 States concurs with the PSIR that no Chapter Four enhancement apply here.
7

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9 **II. Departures:**

10 The United States concurs with Paragraph 111 of the PSIR with regard to
11 factors warranting departure.
12

13 **III. 18 U.S.C. § 3553(a):**

14 The United States concurs with Part F of the PSIR with regard to the factors
15 set forth in 18 U.S.C. § 3553(a).
16

17 **IV. Sentencing Recommendation**

18 The United States recommends that the Defendant be sentenced to three
19 years of probation.
20

21 DATED this 1st day of June 2022.

22
23 VANESSA R. WALDREF
United States Attorney

24 s/ Todd M. Swensen
25 TODD M. SWENSEN
26 Assistant United States Attorney
27
28

1 I hereby certify that on June 1, 2022, I electronically filed the foregoing with
2 the Clerk of the Court using the CM/ECF System, and a copy was emailed to the
3 counsel of record in this case: Alex B. Hernandez, III.
4

5
6 s/ Todd M. Swensen

Todd M. Swensen

7 Assistant United States Attorney

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